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DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



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**IM-23**

**TO:** Storage Tank Owners/Operators and Interested Parties

**FROM:** Roger Przybysz, Chief, Storage Tank Division

**SUBJECT:** Liquefied Petroleum Gas Cylinders and Overfill Prevention Devices

This informational memorandum has been prepared to identify and clarify some of the issues regarding the requirement that all liquefied petroleum gas (LPG) cylinders in size from 4 pounds to 40 pounds are required to have an overfilling prevention device (OPD), as of April 1, 2002. Any tank not equipped with an OPD cannot be legally filled in Michigan after this date. This would include most standard 20 pound gas grill cylinders. The only exceptions to this requirement are:

- (a) Cylinders used exclusively for industrial truck service (including forklift trucks).
- (b) Cylinders identified and used for industrial welding and cutting gases.
- (c) H-cylinders identified and designed for use in the horizontal orientation for which an overfill prevention device is currently not available. The identification requirement for the H-cylinders comes in the form of a label or sticker attached to the cylinder that indicates that this cylinder is not equipped with an OPD. These labels may be obtained through various LPG equipment and accessories vendors.

The requirement that an OPD be on these size cylinders is found in Section 2-3.1.5 (a) through (d) of the National Fire Protection Association (NFPA) 58, Liquefied Petroleum Gas Code, 1998 edition, adopted by reference, in the Liquefied Petroleum Gas (LPG) Rules, 2000 AACS R 29.4001 et seq. This requirement in NFPA 58 has been in effect since September 30, 1998. Any tank in the 4 pound to 40 pound size range, manufactured after this date, except for H-cylinders, is required to have the OPD already installed by the manufacturer of the cylinder. The OPD equipped tanks are easily recognized by their triangle-shaped (three pronged) valve handle design, compared with the round valve handle design found on the older cylinders without an OPD. Also, the letters "OPD" should be stamped directly on the valve body. Additional NFPA 58 requirements are:

- (a) Any cylinder brought in for requalification after September 30, 1998, shall be equipped with an OPD and a fixed maximum liquid level gauge prior to being refilled.

- (b) The cylinders with an OPD installed on them shall be equipped with either a Compressed Gas Association, Inc. (CGA) connection number 791 or 810 as described in CGA Publication V-1.

Cylinders made prior to September 30, 1998, and without an OPD will need to be either refurbished with an approved OPD valve, except for H-cylinders, or recycled. For a list of distributors or marketers in your area who may be able to refurbish or recycle these out of compliance cylinders, please refer to the Michigan Propane Gas Association's website at [www.usemichiganpropane.com](http://www.usemichiganpropane.com) and click under MEMBERS. Not all members may be able to accept these cylinders, so you may want to phone them first to ask if they accept the cylinders.

If you have any questions regarding this matter, please contact the Technical Review Unit at 517-335-7211.

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